

# United States Environmental Protection Agency (EPA) Region 2 290 Broadway New York, NY 10007-1866

### Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S):

JEFF BLANK

DATE. 05/55/15

IC CODE:	ICIS#:	
I. Location of Tank(s)	II. Ownership of Tank(s)	same as location (I.)
Facility Name  CHESTNUT PETROLEUM	Owner Name CHESTNUS  DISTRIBUTORS	inc.
Street Address 75 DUTCH HILL RAAD	Street Address 536 MAIN S	
City ORNGEBURG, NY 10962	City NEW PALTZ	State Zip Code
County ROCKLAND	County	AND STATE
Phone Number Fax Number (345) 630-6710	Phone Number (345) 256-0162	Fax Number
EDGAR AMADOR, SPECIALIST	Contact Person(s)  SALEH EL JA	
IIA. Ownership of Other Facilities	1/4- 5	
□Do you own other UST Facilities Ves No		
If Yes, How many Facilities $99(N45)$	low many USTs 3 23 (No.	(1)
III. Notification Rocks	AND (EFFECTIVE	
Notification to implementing agency; name  State Facility ID # 3 - 990119	AND (EFFECTIVE OH THROUGH ON	01/13)
IV. Financial Responsibility TOKES MARNE	SPECIALTY INS. CO.	Exp. Res 03/13/16
☐ Guarantee ☐ Surety Bond ☐ Letter of Cre	rance: Insurer/Policy # PHPK 11 edit ed (Federal & State government, haza	
V. Release History		
☐ To your knowledge, are there any public or private Drinking Water	r Wells in the vicinity? Yes No	
☐ Evidence of release or spills at facility ☐ Greater	ater than 25 gallons (estimate)	
☐ Initial abatement measures and site characterization ☐ Free ☐ Soil or ground water contamination ☐ Con	e product removal rective action plan submitted nediation completed, no further action	date(s)
Notes:		

728 -	Asvao	0002B			
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120006					
12000G					
	7000G	20000			
REGGAS	DISSEL	PREGAS			
12/08-		<del></del>			
AW FRP -				-	
SPILL	BUCKETS				
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N/A of					
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	T				
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	Tank No.	0001	ASDOD	09023			
IX. UST system Power Gene	used solely by Emergency rator	No-		>			
X. Release Dete		N/A 🛭		,	1 - 1		
Tank RD Methods	ATG	de en e	naen		, sometime :	ja-	
	Interstitial Monitoring	YES					
	Groundwater Monitoring					44.7	
	Vapor Monitoring						
	Inventory Control w/ TTT						
of a comment of the	Manual Tank Gauging						
	Manual Tank Gauging w/ TTT						
	SIR						
12 Months Monitoring Records	Must Make Available Last 12 Months	Y=5		+			
Pressurized Piping R	TANK MAN	N/A	P VEE	DER RO	5T "T	25-35	5"
	Interstitial Monitoring				1		
	Groundwater Monitoring						
	Vapor Monitoring		9				
12 Months	SIR						
Monitoring Records							
	Annual Line Tightness Test	YES			>		
ALLD	Present	425					
	Annual Test	425			4		
T	(State What Months Records Were Ave P. Q. V. ELLY P.D. P.A. T. 1280LTS LING TESTS ->	allable, Describe	Any Failures and	1) Size	OR Ar	AB TIM	
	LING TEITS ->	0 3(0)	114	->	09/11	114	

XI. Repairs	
Repaired tanks and piping are tightness tested within 30 days of repair completion	Yo No Unknown o
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Yo No Unknown o .
Records of repairs are maintained	Y D N D Unknown D
XII. Temporary Closure N/A	,
CP continues to be maintained	Yo No Unknowno
UST system contains product and release detection is performed	Y D N D Unknown D
Cap and secure all lines, pumps, manways	Y = N = Unknown =
Notes:	And the second s

# THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM



Underground Storage Tank Team New York, NY 10007-1866

-	Facility Name	CHESTNUT PETROLEUM
-	Address 75	DUTCH HILL ROSIMUCEBULE
-	UST Reg #	3-890118

# Inspector Observation Report

inspection of Underground Storage Tanks (USTs)

The above named for	d at the conclusion of this inspection.  acility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector ammended corrective action(s):
Potential Violations Obse	
Regulatory Citation	Violation Description
tions Taken:	
Field Citation; #	□ Additional Information required □ On-site request/Due date
me of Owner/Operator R	apresentative:
	Name of EPA Inspector/representative
Edjan.	Amaly JEFREY & BLAIR (Please print)
	Jubban K Blair
er Participants:	(Signature)
	(Credential Number)
	Date of Inspection US/05/15 Time 9:20 MPM

InitiDate JKB 05/05/15

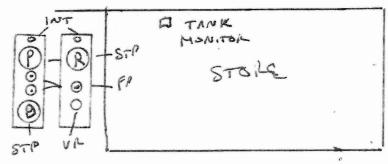
05/02/2014

### SITE DRAWING

DATE: 05/05/15 TIME ON SITE: 8/85 ANTIME OFF SITE: 9,2000

WEATHER: 750 + 83MAY

ENVIRONMENTALLY SENSITIVE AREA: Yo No



DISPENSERS

SETZU POTA EPD

41.04060'N

# PHOTOS

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O20 STP PRE
O20 STP PRE
O21 FP DIE
O22 STP DIE
O23 FUEL PAD
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re Pictures

### Required Fields to be used for ICIS Only

### Compliance Monitoring

Activity: UST Inspection

### Inspection Conclusion Data Sheet

- Deficiencies observed: (Put an X for each observed deficiency)

  Potential failure to complete or submit a notification, report, certification, or manifest

  Potential failure to follow or develop a required management practice or procedure

  Potential failure to maintain a record or failure to disclose a document

  Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

  Potential failure to report regulated events, such as spills, accidents, etc.
- 2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? Yes / No
- 3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? Yes / No If yes, what actions were taken?
- 4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? Yes No
- 5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? Yes/No

Init/Date J KB 05/03/15

Regulatory Subject Area	Measure#	SOC Measure / Federal Citation		In Compliance?		
			N/A	Y	N	
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		V		
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		V		
	*,	Automatic shutoff is operational (ie., device not tampered with or inoperable ) [280.20(c)(1)(ii)(A), 280.21(d)]				
		Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]  Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]				
		☐ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]				
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]		,		
III b. Operation and Maintenance of	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	~			
Corresion Protection	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	1			
		☐ UST system (Choose one)				
ur.		UST in operation				
		UST in temporary closure				
		CP System is properly operated and maintained				
		CP system is performing adequately based on results of testing. [280.31(b)]; - or -				
· ·		☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.				

Regulatory Subject Area	Measure#	SOC Measure / Federal Citation	In C	ompli	ance?
		The second secon	N/A	Y	N
III b. Operation and Maintenance of	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	V		
Corrosion Protection (Continued)	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	/	60-1	
IV. Tank and Piping 8 Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]			
		Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.			
		For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:	JAN.		
		Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]			
		Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)]			
		Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]			
		For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]:			
		Tank and piping meet new UST requirements [280.21(a)(1)]	l J.		
		Steel tank is internally lined. [280.21 (b)]			
		☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Instructions -	To Determine Com	pliance Status of Measi	ures #1-7,
Work Through the Worl	sheet "Commonly	Used Release Detection	Methods" Below.

Regulatory Subject Area	Measure	SOC Measure/ Federal Citation	In	Complian	nce?
	#		N/A	Y	N
I. Release Detection Method	1	Release detection method is present. [280.40(a)]		./	Section 1997
Presence and Performance Requirements	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		/	tajo e suestaj el esperidori, biol
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		V.	ACT THE STREET WAS
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	1		
٨		Non-passing results reported and resolved in accordance with implementing agency's directions. [289.40(b)]			THE PROPERTY OF THE PROPERTY O
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months).  [280.41(a), and 280.45(b)]		/	
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	V		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product.  [280.70(a)]	V		

### Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
			A. Inventory Control with Tank Tightness Testing (T.T.T)
			☐ Inventory control is conducted properly.
			☐ T.T.T. performed as required (See "D" below).
			Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)]
	1 1		☐ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)]
			Product dispensing is metered and recorded within local standards for meter calibration to required accuracy.  [280.43(a)(5)]
	4		☐ Water is monitored at least monthly. [280.43(a)(6)]

	Worksheet (Continued) - Commonly Used Release Detection Methods						
Tank	Pressurize d Pipe	Non-exempt Suction	Release Detection Method				
(Choose one)	(Choose Two)	Pipe (Choose one)					
D			B. Automatic Tank Gauge (ATG)				
			☐ ATG is set up properly. [280.40(a)(2)]				
			☐ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]				
	1		C. Manual Tank Gauging (MTG)				
			☐ Tank size is appropriate for using MTG. [280.43(b)(5)]				
			☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐				
			Method is being conducted correctly. [280,43(b)(4)]				
	1 , [		□ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] □				
Prof.			Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]				
	Ø		D. Tightness Testing (Safe Suction piping does not require testing)				
			Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)]				
			Tightness testing is conducted within specified time frames for method:				
۵			☐ Tanks - every 5 years [280.41(a)(1)]				
	1 1		Pressurized Piping - annually [280.41(b)(1)(ii)]				
			Non-exempt suction piping - every 3 years [280.41(b)(2)]				
		D	☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]				
-		u	E. Ground Water or Vapor Monitoring				
			☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐				
			vapor monitoring well is not affected by high ground water. [280.43(e)(3)]				
			☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐				
TA T			Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]				
- Court		u	F. Interstitial Monitoring				
			Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)]				
			☐ Sensor properly positioned. [280.40(a)(2)]				

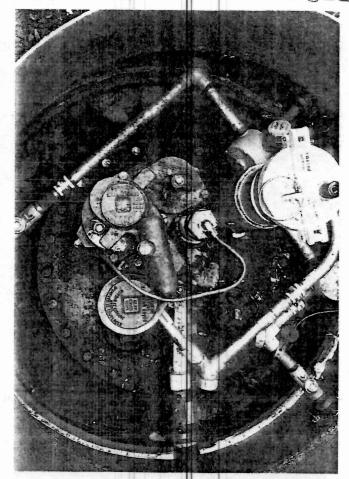
Worksheet (Continued) - Commonly Used Release Detection Methods						
Tank	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method			
	a		G. Automatic Line Leak Detector (ALLD)  ALLD is present and operational. [280.44(a)]  Annual function test of the ALLD has been conducted and records are available. [280.44(a)]			
0			<ul> <li>H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]</li> <li>□ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or</li> <li>□ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)]</li> </ul>			
			□ S.I.R Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]			

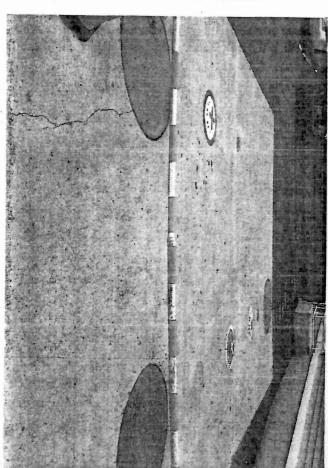
Notes: N/A - Indicates that the measure is not applicable.

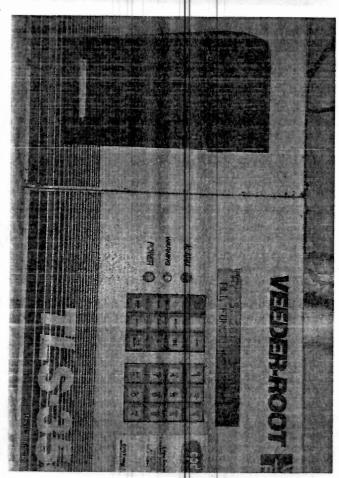
any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

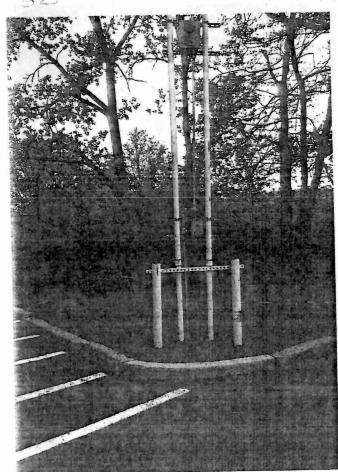


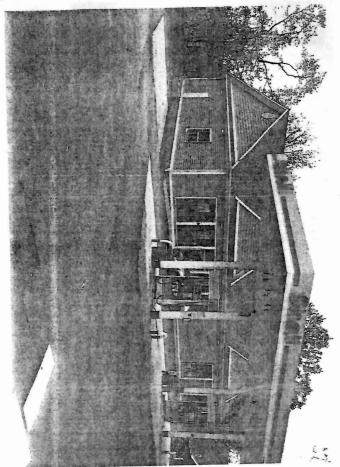














# United States Environmental Protection Agency (EPA) Region 2 290 Broadway New York, NY 10007-1866 Underground Storage Tank (UST) Inspection Fo

INSPECTOR NAME(S): JEFF BLAGE	DATE:	03/13/13				
SIC CODE:	ICIS#:					
I. Location of Tank(s)   □ Tribal	II. Ownership of Tank(s)	same as location (I.)				
Facility Name  5 HELL  Street Address	Owner Name CPD NY &N  Street Address	ercy cort.				
75 DUTCH HILL KOAD  City State Zip Code  OKANGEBURG, NY 10962  County	536 MAIN ST City NEW PALTZ,	State Zip Code				
Phone Number Fax Number  Contact Person(s)	Phone Number  (345) 25C - OL 62  Contact Person(s)					
EDGAR AMABOT, SPECIALIST	SCOTT PARKER	DIKEGOR-				
23 G ROCKLAND	w many USTs 337 (NYS					
Notification to implementing agency; name State Facility ID # 3 ~ 9 0 1 1 9	KWAITING REGISTING	Marmysini no				
IV. Financial Responsibility ACE ILLINOL	ASUZNI NOTHU 2	arce co.				
☐ Guarantee ☐ Surety Bond ☐ Letter of Cred	nce: Insurer/Policy #	1				
V. Release History  N/A   To your knowledge, are there any public or private Drinking Water	Wells in the vicinity? Yes /(No					
□ Evidence of release or spills at facility □ Greater than 25 gallons (estimate) □ Releases reported to implementing agency; if so, date(s) □ [280.53] □ Release confirmed; when and how □ Initial abatement measures and site characterization □ Free product removal □ Soil or ground water contamination □ Corrective action plan submitted □ Remediation ongoing □ Remediation completed, no further action; date(s)						
Notes:						

						STATE OF THE PARTY
VI. Tank Information Tank No.	0001	OUOZA	000 ZB		September 1999 Control of the Contro	
Tank presently in use	No -		>			
If not, date last used (see Section XII)	AUGUST Z	012				
If empty, verify 1" or less left (see Section XII)	Y25 -					
Capacity of Tank (gal)	12000 G	7000 G	50006			
Substance Stored	GASOLIA	E	Dreser			
M/Y Tank installed Upgraded	12/08-					
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	DW FKP -					×
Spill Prevention	SPILL B.	- KEIN -				
Overfill Prevention (specify type)	AUTO	SMUTOFF	5			
Special Configuration: Compartmentalized, Manifolded	No	Compa	RTARNE			
VII. Piping Information						
Piping Type: Pressure, Suction	PRESSO	le-	-	-		
Piping Construction:  Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	PLEXIBLE					
Tank and Piping Notes:	*					
VIII. Cathodic Protection	N/A				2	
Integrity Assessment conducted prior to upgrade		1	,			
Interior Lining: Interior lining inspected						,
Impressed Current CP Test records	1	1	1-1-			1
Rectifier inspection records	+					
Sacrifical Anode: CP test records		<u>l</u>	1	The state of the s		
CP Notes:						

Page 2 of 7

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IX. UST system Power Gene	No -	×					
X. Release Dete	ection	N/A 🗆					
Tank RD Methods	ATG			14			
	Interstitial Monitoring	YES-					
\$	Groundwater Monitoring						
	Vapor Monitoring			7 114	rind sold	rist pik	
3.	Inventory Control w/ TTT					d ded	
to the last	Manual Tank Gauging		- 10 - 12	- 444	= =!* -1	1 10	
	Manual Tank Gauging w/ TTT						
. 1	SIR						
12 Months (I Monitoring Records I	<u>Must</u> Make Available Last 12 Months For Compliance)					× 100	
	TIAL PESOUTS R	gerinni Berinni	ng in	MAH ZE BURING NUGUSF	Recor 201	sometimes.	
Pressurized Piping RL	) Methods	N/A 🗆					
4	Interstitial Monitoring						-
	Groundwater Monitoring					* I	
	Vapor Monitoring						
12 Months	SIR						
Monitoring Records	Annual Line Tightness Test						
ALLD	Present						
	Annual Test						
Piping RD Notes: (S	State What Months Records Were Availa	able, Describe Any	Failures and Des	cribe What Investi	gation Occu	red Due to Failure)	
	NO TEST R						

Page 3 of 7

XI. Repairs N/A of Y D N D Unknown D Repaired tanks and piping are tightness tested within 30 days of repair completion Y D N D Unknown D CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system Y N Unknown Records of repairs are maintained XII. Temporary Closure N/A D Y N D Unknown D CP continues to be maintained Y D N D Unknown D UST system contains product and release detection is performed Y N W Unknown Cap and secure all lines, pumps, manways Notes:



# THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM Ground Water Compliance Section New York, NY 10007-1866

### Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

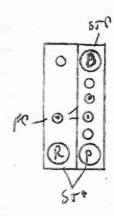
□ No violations observed a	t the conclusion of this inspection.			
The above named faci     observations and/or recom	lity was inspected by a duly authorized mended corrective action(s):	representative of EPA Region 2	, and the following	g are the inspector's
Violations Observed:				
Regulatory Citation	Violation Description			
\$ 280.45	Frompe to ma	INTAIN RECORDS	or per	erec
\$	Private to MN	FORME		
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9				
\$				
Servered and the server	THE PARTY OF THE P	AND THE PROPERTY OF THE PROPER	ANTENER OF	220018-1
5				
§				
Actions Taken:	Additional information required	n On site request/Due date		
TANK	PRESENT DEFECT			
Name of Owner/Operator Ro	epresentative:	Name of EPA Inspector/repr	recentative	
Edgan Other Participants:	(Please print) (Signature)	JEFER Juffer	(Please print) (Signature) Credential Number)	Short R
		Date of Inspection 03//	3/13 Time /	3,30 MAPM

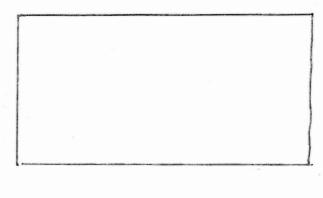
### SITE DRAWING

DATE: 03/13/13 TIME ON SITE: 9:5 DAM TIME OFF SITE: (0) 30 AM

WEATHER: 45" - 13NNY

ENVIRONMENTALLY SENSITIVE AREA: Y ... N ... If "Yes", please describe:





## PHOTO 5

331 FUZL PAD

332 FP REG

333 STP REC

334 FP PRE

335 STP PRE

33c FP DIE

337 STP. DIE

338 GNOSE STICK

339 GNGE STICK

340 GWGEGRUK

341 5145

# DISPENSERS

Pictures

#### Required Fields to be used for ICIS Only

Com	pliar	ice l	Mor	nitori	na
-	PILE	1001	4101	HILO H	I M

Activity: UST Inspection

Inspection	Conclusion	Data	Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? Y 53

Deficiencies observed: (Put an X for each observed deficiency)

- Y Potential failure to complete or submit a notification, report, certification, or manifest
- Y Potential failure to follow or develop a required management practice or procedure
- V Potential failure to maintain a record or failure to disclose a document
- Potential failure to maintain/inspect/repair meters, sensors, and recording equipment
- Potential failure to report regulated events, such as spills, accidents, etc.
- 2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection?
- 3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? Yes (No If yes, what actions were taken?
- 4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? (Yes) No
- 5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? Yes/ No

Init/Date JKB 03/14/13

Regulatory Subject Area	Measure#	# SOC Measure / Federal Citation		In Compliance?		
李 萧 马 惠 建			N/A	Y	N	
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		/		
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		/		
		Automatic shutoff is operational (ie., device not tampered with or inoperable ) [280.20(c)(1)(ii)(A), 280.21(d)]		*		
		☐ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]	to the second se			
		Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]		*		
	ı	☐ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]				
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	~			
III b. Operation and Maintenance of	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	/			
Corrosion Protection	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	~			
*		UST system (Choose one)				
	н	☐ UST in operation				
		UST in temporary closure				
		☐ CP System is properly operated and maintained				
۵		CP system is performing adequately based on results of testing. [280.31(b)]; - or -				
	-	CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.				

Regulatory Subject Area	ea Measure#	SOC Measure / Federal Citation	In Compliance?			
		THE COURSE OF THE CASE OF THE	N/A	Y	N	
III b. Operation and Maintenance of	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	1			
Corrosion Protection (Continued)	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	~			
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]				
		Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.  For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:				
		Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]				
		Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)]				
		Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]				
		For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]:				
		Tank and piping meet new UST requirements [280.21(a)(1)]				
		☐ Steel tank is internally lined. [280.21 (b)]				
		☐ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]				

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area		Measure	SOC Measure/ Federal Citation	In	Complian	ce?
Regulatory	Subject Area	#	1987   10   10   10   10   10   10   10   1		Y	N
I. Release Detection Method Presence and Performance Requirements  3		1	Release detection method is present. [280.40(a)]		V	
		2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		~	
		3	Release detection system meets the performance standards at 280.43 or 280.44.  [(280.40(a)(3)]		v	
		4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	1/		
			Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]	1		
II. Release Detection Testing 5		5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			~
III. Hazardous Systems	s Substance UST	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	1		
IV. Temporary Closure 7		7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]		/	
			Workshoot Commonly Used Pologge Detection Methods			
Tank	Pressurize	Non-exem Survivo				
Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exem Suction Pipe (Choose one	Release Detection Method			
	d Pipe	Suction Pipe	Release Detection Method			
(Choose one)	d Pipe	Suction Pipe	Release Detection Method			
(Choose one)	d Pipe	Suction Pipe	A. Inventory Control with Tank Tightness Testing (T.T.T)  □ Inventory control is conducted properly.  □ T.T.T. performed as required (See "D" below).			
(Choose one)	d Pipe	Suction Pipe	A. Inventory Control with Tank Tightness Testing (T.T.T)  □ Inventory control is conducted properly.	e recorded o	each operat	ing
(Choose one)	d Pipe	Suction Pipe	A. Inventory Control with Tank Tightness Testing (T.T.T)  Inventory control is conducted properly.  T.T.T. performed as required (See "D" below).  Inventory volume measurements for inputs, withdrawals, and remaining amounts are day and reconciled as required. [280.43(a)(1), 280.43(a)(3)]  Equipment is capable of 1/8-inch measurement. [280.43(a)(2)]			
(Choose one)	d Pipe	Suction Pipe	A. Inventory Control with Tank Tightness Testing (T.T.T)  Inventory control is conducted properly.  T.T.T. performed as required (See "D" below).  Inventory volume measurements for inputs, withdrawals, and remaining amounts are day and reconciled as required. [280.43(a)(1), 280.43(a)(3)]			

		Workshe	et (Continued) - Commonly Used Release Detection Methods
Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
			B. Automatic Tank Gauge (ATG)
	-		☐ ATG is set up properly. [280.40(a)(2)] ☐ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐  ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
		*	C. Manual Tank Gauging (MTG)  □ Tank size is appropriate for using MTG. [280.43(b)(5)]  □ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) □  Method is being conducted correctly. [280.43(b)(4)]  □ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] □  Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
			D. Tightness Testing (Safe Suction piping does not require testing)  □ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product.  [280.43(c)]  □ Tightness testing is conducted within specified time frames for method:  □ Tanks - every 5 years [280.41(a)(1)]  □ Pressurized Piping - annually [280.41(b)(1)(ii)]  □ Non-exempt suction piping - every 3 years [280.41(b)(2)]  □ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
			E. Ground Water or Vapor Monitoring  ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐  Vapor monitoring well is not affected by high ground water. [280.43(e)(3)]  ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐  Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
	<u> </u>		F. Interstitial Monitoring  Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)]  Sensor properly positioned. [280.40(a)(2)]

	Worksheet (Continued) - Commonly Used Release Detection Methods						
Tank	Pressurize d Pipe	Non-exempt Suction	Release Detection Method				
(Choose one)	(Choose Two)	Pipe (Choose one)					
			G. Automatic Line Leak Detector (ALLD)				
			ALLD is present and operational. [280.44(a)]				
			☐ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]				
			H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]				
		*	☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or				
			☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)]				
			☐ S.I.R Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]				

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

